

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MIGUEL RIVERA,

Plaintiff,

v.

NAVIENT SOLUTIONS, LLC,

Defendant.

No. 1:20-cv-01284

Hon. Lewis J. Liman

**MOTION OF DEFENDANT, NAVIENT SOLUTIONS, LLC,
TO DISMISS PLAINTIFF'S COMPLAINT**

PLEASE TAKE NOTICE that Defendant, Navient Solutions, LLC ("NSL"), hereby moves for the dismissal with prejudice of Plaintiff's Complaint under Federal Rule of Civil Procedure Rule 12(b)(6). In support of this Motion, NSL incorporates by reference the accompanying Memorandum of Law. A proposed Order is attached.

/s/ Lijue T. Philip, LP0326

Eric M. Hurwitz (N.Y. Bar. No. 5310644)

Lijue T. Philip (LP0326)

STRADLEY RONON STEVENS & YOUNG, LLP

A LIMITED LIABILITY LAW PARTNERSHIP LLP

100 Park Avenue, Suite 2000

New York, NY 10017

T: (212) 812-4124

F: (646) 682-7180

E: ehurwitz@stradley.com; lphilip@stradley.com

Attorneys for Defendant, Navient Solutions, LLC

DATED: April 28, 2020